

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>v.</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>MELISSA MELLO</b>	<b>:</b>	<b>VIOLATIONS:</b>
		<b>18 U.S.C. § 1029(b)(2) (conspiracy to</b>
		<b>commit access device fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1029(a)(2) (access device</b>
		<b>fraud - 1 count)</b>
		<b>18 U.S.C. § 1028A (aggravated identity</b>
	<b>:</b>	<b>theft - 1 count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Best Buy Co., Inc., Richfield, Minnesota, operated Best Buy retail stores, which purchased and sold merchandise, including computers, televisions and other electronic products, throughout the United States, including various locations in the Philadelphia, Pennsylvania area.

2. The Home Depot, Inc., Atlanta, Georgia, operated Home Depot retail stores, which purchased and sold merchandise, including building and maintenance supplies and products, in all fifty states in the United States, including various locations in the Philadelphia, Pennsylvania area.

3. Lowe's Companies, Inc., Mooresville, North Carolina, operated Lowe's retail stores, which purchased and sold merchandise, including building and maintenance

supplies and products, throughout the United States, including various locations in the Philadelphia, Pennsylvania area.

4. From in or about November 6, 2008, to in or about December 14, 2008, in the Eastern District of Pennsylvania, defendant

**MELISSA MELLO**

conspired and agreed, together and with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly and with intent to defraud, use and traffic in one or more counterfeit and unauthorized access devices, that is store accounts in the names of other persons, to obtain anything of value aggregating \$1000 or more during a one year period, in violation of Title 18, United States Code, Section 1029(a)(2).

**MANNER AND MEANS**

It was part of the conspiracy that:

5. Defendant MELISSA MELLO obtained the names, addresses, social security numbers and dates of birth of J.M., J.S., J.S.1, A.K., V.D., M.D., L.S., K.P., E.G., T.L. and J.N., without their consent, from Person No. 1 known to the United States Attorney (Person No. 1). Person No. 1 also provided defendant MELLO with counterfeit driver's licenses that were in the names of those individuals, but which contained defendant MELLO's photograph.

6. Defendant MELISSA MELLO obtained line of credit accounts at different branches of Best Buy, Home Depot and Lowe's by completing applications using the names, addresses, social security numbers and dates of birth of the individuals she had received from Person No. 1, and by using as identification the counterfeit driver's licenses in the names of these individuals, which had also been provided to her by Person No. 1.

7. Defendant MELISSA MELLO used the accounts which she had obtained

using the identities of others, without their authorization, to make purchases of merchandise on behalf of Person No. 1 from Best Buy, Home Depot and Lowe's.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, in the Eastern District of Pennsylvania, on or about each of the following dates, at the stores and locations listed below, each transaction representing a separate overt act, defendant MELISSA MELLO, without authorization, at the direction of Person No. 1, used accounts obtained by the fraudulent use of the names, social security numbers, dates of birth, and addresses of the individuals listed in each overt act to make purchases or returns of things of value:

Overt Act	Date	Store	Location	Victim	Amount
1	11/6/2008	Best Buy	Willow Grove	J.M.	\$2,755.98 (purchase)
2	11/7/2008	Best Buy	Willow Grove	J.M.	\$1,536.98 (purchase)
3	11/8/2008	Home Depot	Souderton	J.S.	\$3,631.53 (purchase)
4	11/8/2008	Best Buy	Downingtown	J.S.	\$2,167.68 (purchase)
5	11/9/2008	Home Depot	Souderton	J.S.	\$4,621.56 (purchase)
6	11/9/2008	Best Buy	Quakertown	J.S.	\$2,575.76 (purchase)
7	11/9/2008	Best Buy	Quakertown	A.K.	\$2,575.76 (purchase)
8	11/10/2008	Home Depot	Montgomery	V.D.	\$3,163.04 (purchase)
9	11/11/2008	Home Depot	Souderton	J.S.	\$ 339.55 (purchase)

10	11/12/2008	Home Depot	Plymouth Meeting	V.D.	\$4,493.31 (purchase)
11	11/13/2008	Lowes	Montgomery	V.D.	\$2,649.77 (purchase)
12	11/14/2008	Home Depot	Port Richmond	V.D.	\$ 332.03 (purchase)
13	11/20/2008	Home Depot	Warrington	M.D.	\$3,375.04 (purchase)
14	11/20/2008	Lowes	Warrington	M.D.	-\$ 759.38 (return)
15	11/21/2008	Lowes	Warrington	M.D.	\$1,790.75 (purchase)
16	11/22/2008	Home Depot	Warrington	M.D.	\$3,168.47 (purchase)
17	11/22/2008	Home Depot	Philadelphia	L.S.	\$2,841.85 (purchase)
18	11/24/2008	Lowes	Willow Grove	K.P.	\$ 633.88 (purchase)
19	11/25/2008	Home Depot	Philadelphia	K.P.	\$1,363.61 (purchase)
20	11/26/2008	Home Depot	King of Prussia	E.G.	\$2,584.84 (purchase)
21	11/28/2008	Home Depot	King of Prussia	E.G.	\$1,607.00 (purchase)
22	12/4/2008	Home Depot	West Norriton	J.S.1	\$2,355.39 (purchase)
23	12/5/2008	Home Depot	West Norriton	J.S.1	\$3,382.39 (purchase)
24	12/5/2008	Lowes	Upper Moreland	J.S.1	\$1,450.87 (purchase)
25	12/7/2008	Home Depot	Souderton	T.L.	\$2,615.66 (purchase)
26	12/9/2008	Home Depot	Souderton	T.L.	\$ 1,666.24 (purchase)

27	12/10/2008	Home Depot	Souderton	T.L.	\$ 586.87 (purchase)
28	12/10/2008	Home Depot	Souderton	T.L.	\$1,564.98 (purchase)
29	12/10/2008	Home Depot	Souderton	T.L.	-\$ 580.88 (return)
30	12/14/2008	Home Depot	Philadelphia	J.N.	\$1,001.00 (purchase)

All in violation of Title 18, United States Code, Section 1029(b)(2).

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs One through Three of Count One are incorporated by reference.

2. From on or about November 8, 2008 through on or about December 14, 2008, in the Eastern District of Pennsylvania, defendant

**MELISSA MELLO**

knowingly and with the intent to defraud used approximately 16 unauthorized access devices, that is, accounts obtained in the names of J.M., J.S., J.S.1, A.K., V.D., M.D., L.S., K.P., E.G., T.L. and J.N., to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$61,491.53, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2), and (c)(1)(A)(i).

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about December 14, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**MELISSA MELLO**

knowingly and without lawful authority possessed and used a means of identification of another  
person, that is, the name of “J.N.,” during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

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**MICHAEL L. LEVY**  
**UNITED STATES ATTORNEY**